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2122-CC00122 - MEGHAN HODGE V MEREDITH CORPORATION OF IOWA ET AL (E-CASE)

Case File | Parties & Attorneys | Docket Entries | Charges, Judgments & Sentences | Service Information | Filings Due | Scheduled Hearings & Trials | Civil Judgments | Garnishments/Execution

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- 02/08/2021** ☐ **Notice of Service**
Summons to Scott Deiner Returned Executed.
Filed By: JILL A SILVERSTEIN
- ☐ **Notice of Service**
Summons to Meredith Corp Returned Executed.
Filed By: JILL A SILVERSTEIN
- ☐ **Summons Personally Served**
Document ID - 21-SMCC-518; Served To - DIENER, SCOTT; Server - ; Served Date - 05-FEB-21; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served
- ☐ **Corporation Served**
Document ID - 21-SMCC-517; Served To - MEREDITH CORPORATION OF IOWA; Server - ; Served Date - 01-FEB-21; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served
- 02/01/2021** ☐ **Jury Trial Scheduled**
Scheduled For: 07/06/2021; 9:00 AM ; MICHAEL FRANCIS STELZER; City of St. Louis
- 01/19/2021** ☐ **Summons Issued-Circuit**
Document ID: 21-SMCC-518, for DIENER, SCOTT.
- ☐ **Summons Issued-Circuit**
Document ID: 21-SMCC-517, for MEREDITH CORPORATION OF IOWA.
- ☐ **Request Filed**
Request for Appointment of Process Server.
Filed By: JILL A SILVERSTEIN
On Behalf Of: MEGHAN HODGE
- 01/15/2021** ☐ **Filing Info Sheet eFiling**
Filed By: JILL A SILVERSTEIN
- ☐ **Note to Clerk eFiling**
Filed By: JILL A SILVERSTEIN
- ☐ **Pet Filed in Circuit Ct**
Petition for Damages; Exhibit 1; Exhibit 2.
Filed By: JILL A SILVERSTEIN
On Behalf Of: MEGHAN HODGE
- ☐ **Judge Assigned**

EXHIBIT
A

IN THE CIRCUIT COURT FOR ST. LOUIS CITY
STATE OF MISSOURI

Meghan Hodge,)	
)	
Plaintiff,)	
)	
v.)	Cause No.
)	
Meredith Corporation of Iowa,)	
doing business as KMOV)	
<u>Serve:</u>)	
The Corporation Company)	
120 S. Central Ave.)	
St. Louis, MO 63105,)	
)	
and)	
)	
Scott Diener)	
<u>Serve:</u>)	
KMOV-TV)	
One S. Memorial Drive)	
St. Louis, MO 63102)	
)	
Defendants.)	

Petition for Damages

1. Plaintiff Meghan Hodge, also known as Meghan Danahey ("Hodge"), brings this action for discrimination and retaliation under the Missouri Human Rights Act, §213.010 et seq. (2000).

The Parties

2. Hodge was employed by KMOV as a meteorologist from April 2014 to September 17, 2020.
3. Defendant Meredith Corporation of Iowa, doing business as KMOV, is an "employer" under the Missouri Human Rights Act, §213.010(7) R.S.Mo. because KMOV is an organization

employing six or more employees doing business at One Memorial Drive, St. Louis City, Missouri and at kmov.com.

4. KMOV is also known as KMOV4 and KMOV-TV.
5. Defendant Meredith Corporation is a “person” under the Missouri Human Rights Act, §213.010(7) R.S.Mo. because Meredith is a corporation.
6. Scott Diener was the News Director for KMOV at all times described below. Diener acted in the interest of and as agent of KMOV.
7. Diener is a citizen of the state of Missouri.

Common Allegations

8. Hodge is female.
9. Hodge was born in 1974.
10. KMOV hired Hodge into the No. 2 meteorologist position in April 2014; her broadcast times were Monday through Friday at noon and 5:00p.m.
11. Throughout Hodge’s employment with KMOV, Steve Templeton, held the No. 1 meteorologist position; his broadcast times were Monday through Friday at 6:00p.m. and 10:00p.m.
12. Templeton is male.
13. In February 2018, Diener planned to remove Hodge from her assignment as the No. 2 meteorologist position and reassign those broadcast timeslots to Templeton and Kent Ehrhardt.
14. Ehrhardt is male.

Hodge reports discrimination to SAG-AFTRA; Diener threatens Hodge

15. Diener's proposed reassignment would have diminished the roles of the female meteorologists while expanding the roles and on-air time of the male meteorologists.
16. Hodge complained to her SAG-AFTRA union representative that Diener planned to demote Hodge because of her gender and because of her age.
17. Within days of her complaint, SAG-AFTRA conducted a meeting with KMOV, Diener, Hodge, and the KMOV weather team to address the discrimination reported by Hodge.
18. After Hodge made the complaint to the union, Diener did not implement his planned reassignments.
19. Diener then threatened to remove Hodge from the No. 2 on-air assignments and give her the fewer weekend assignments when her contract came up for renewal in 2020.

Diener creates hostile work environment for Hodge, but KMOV does nothing

20. After Hodge complained about Diener, Diener repeatedly interrupted or distracted Hodge during her live broadcasts throughout 2018 and 2019.
21. In late 2018, Diener created unwritten severe weather broadcast policies that excluded Hodge from participating in the broadcast of major weather events.
22. Beginning in late 2018 and throughout 2019, Hodge reported Diener's conduct to KMOV's human resource representative and the SAF-AFTRA union representative, including that Diener was creating a hostile work environment for Hodge.
23. KMOV failed to take any action in response to Hodge's complaints.
24. In January 2020 Diener demoted Hodge by changing her schedule from 10 weekday broadcasts as the No. 2 meteorologist to 4 weekend broadcasts. These weekend broadcasts were considered the least important at KMOV.

25. Also, in January 2020 Diener assigned Hodge to perform weather and general reporting duties outside the station on 3 of her 5 working days at KMOV.
26. Diener assigned Hodge to these general reporting duties even though he knew that Hodge did not have education or experience in general news journalism or reporting.
27. Hodge had education and experience as a meteorologist broadcasting and reporting on weather events and related sciences, the position into which KMOV hired Hodge.

Hodge again seeks help from SAG-AFTRA, KMOV retaliation escalates

28. Hodge reported to SAG-AFTRA that KMOV demoted Hodge because of gender, age, and previous complaints about discrimination.
29. On January 23, 2020 SAG-AFTRA filed a grievance on behalf of Hodge against KMOV and Meredith Corporation for discrimination.
30. Diener and KMOV management received notice of Hodge's grievance the next day.
31. The same day as Diener and KMOV received notice of Hodge's discrimination grievance, Diener removed Hodge from weather reporting duties and assigned Hodge to report on a bus crash.
32. On April 28, 2020, the SAG-AFTRA notified Hodge that her grievance would be arbitrated on December 3, 2020.
33. KMOV management and Diener received notice of Hodge's arbitration the same day.
34. Two days later, on April 30, 2020 Diener assigned Hodge to general news reporting duties one day per week and restricted her from reporting on the weather as part of her permanent assignment.

35. On May 4, 2020 KMOV furloughed all news staff in the form of workday reduction, reducing the workweek from five days to four days per week.
36. Diener directed Hodge to continue with general news reporting duties exclusively for one day of each four-day work week, further reducing the number of days Hodge could work as a meteorologist from 4 days per week to 3 days per week.

Diener intensifies his hostile conduct toward Hodge

37. On the first day of the furlough period, there was a severe weather event that typically required all meteorologists for support and broadcast. Diener, however, directed Hodge to report on a private high school's "senior skip day" rather than participate in covering the severe weather event.
38. Even though KMOV's weather department was understaffed during the furlough period, Diener did not reassign Hodge to her full-time meteorological duties and broadcasts.
39. Hodge was the only full-time meteorologist assigned to a general news reporting shift.
40. Hodge was the only meteorologist who continued to complain about sex and age discrimination and pursue those complaints through arbitration.
41. Of the 41 meteorologists in the nine Meredith stations in the top 50 U.S. television markets Hodge was the only Certified Broadcast Meteorologist who defendant assigned to general reporting duties.
42. On June 22, 2020, Hodge filed a charge of discrimination with the Equal Employment Opportunity Commission and Missouri Commission on Human Rights based on sex, age, and retaliation naming KMOV and Meredith as respondents.
43. On July 1, 2020, KMOV hired JD Sosnoff as its new general manager.

- 44. On August 4, 2020, Hodge emailed Sosnoff about her reports of discrimination and the hostile work environment created by Diener's harassing and retaliatory conduct.
- 45. Sosnoff replied on August 6, stating he was aware of Hodge's charge of discrimination and her upcoming arbitration scheduled for December 2020.
- 46. Sosnoff failed to take any action to remedy the continued hostile work environment.
- 47. On September 5, 2020, KMOV lifted the furlough and Hodge returned to her 5-day work week of weekend weather broadcasts and general reporting assignments.
- 48. KMOV did nothing in response to Hodge's complaints about Diener and the hostile work environment.

KMOV fires Hodge

- 49. On September 17, 2020, KMOV fired Hodge.
- 50. KMOV fired Hodge in retaliation for Hodge's opposition to and complaints about sex and age discrimination.
- 51. Diener and KMOV management created a hostile work environment for Hodge in retaliation for Hodge's opposition to and complaints about sex and age discrimination.
- 52. Hodge's job performance was outstanding.
- 53. Hodge's demotion dramatically reduced her earning capacity in meteorologist jobs she could obtain after KMOV and Diener fired her.
- 54. As a result of Diener's actions Hodge suffered extreme emotional distress and physical harm.
- 55. On October 22, 2020 Hodge filed an Amended Charge of Discrimination with the EEOC and MCHR, a copy is attached as Exhibit 1.

56. On January 15, 2021 the MCHR issued a Notice of Right to Sue to Hodge, a copy is attached as Exhibit 2.

57. Hodge filed her lawsuit against KMOV within 90 days of the right to sue letter.

COUNT I - Discrimination

58. Hodge incorporates paragraphs 1 through 57 as though fully set forth herein.

59. Meredith Corporation of Iowa, doing business as KMOV, violated the Missouri Human Rights Act, R.S.Mo. §213.055 by discriminating against Hodge because of her age and gender.

60. Defendant's actions were willful, wanton, and malicious.

61. As a direct and proximate result of defendant's conduct, Hodge has been damaged in that she has lost wages and other benefits of employment, suffered emotional distress, physical harm, humiliation, embarrassment and loss of enjoyment of life.

WHEREFORE, Plaintiff Meghan Hodge prays for judgment in her favor against Defendant Meredith Corporation of Iowa for compensatory and punitive damages in an amount that will fairly and adequately compensate her, the exact amount to be proven at trial, but in excess of \$25,000.00, reasonable attorney fees and costs, and such other relief as this Court deems just and proper.

COUNT II - Retaliation

62. Hodge incorporates paragraphs 1 through 57 as though fully set forth herein.

63. Meredith Corporation of Iowa, doing business as KMOV, violated the Missouri Human Rights Act, R.S.Mo. §213.070 by retaliating against Hodge because of her complaints about discrimination.

64. Defendant's actions were willful, wanton, and malicious.

65. As a direct and proximate result of the conduct of defendant, Hodge has been damaged in that she has lost wages and other benefits of employment, suffered emotional distress, physical harm, humiliation, embarrassment, and loss of enjoyment of life.

WHEREFORE, Plaintiff Meghan Hodge prays for judgment in her favor against Defendant Meredith Corporation of Iowa for compensatory and punitive damages in an amount that will fairly and adequately compensate Plaintiff, the exact amount to be proven at trial, but for certain in excess of \$25,000.00, reasonable attorney fees and costs, and such other relief as this Court deems just and proper.

Count III – Intentional Infliction of Emotional Distress

66. Hodge incorporates paragraphs 1 through 57 as though fully set forth herein.

67. Diener's conduct toward Hodge was intentional or reckless.

68. Diener's conduct toward Hodge was extreme and outrageous.

69. As a direct and proximate result of the conduct of Diener, Hodge has been damaged in that she has suffered severe emotional distress, physical harm, and loss of enjoyment of life.

WHEREFORE, Plaintiff Meghan Hodge prays for judgment in her favor against Defendant Scott Diener for compensatory and punitive damages in an amount that will fairly and adequately compensate Plaintiff, the exact amount to be proven at trial, but for certain in excess of \$25,000.00, costs, and such other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Jill A. Silverstein
SilversteinWolf, LLC
Jill A. Silverstein #34433
js@silversteinwolf.com
530 Maryville Centre Dr., Ste 460
St. Louis, MO 63141

Phone: (314) 744-4010
Facsimile: (314) 744-4026

Attorneys for Plaintiff

2122-CC00122

AMENDED CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.</small>		AGENCY <input checked="" type="checkbox"/> FEPA <input type="checkbox"/> EEOC	CHARGE NUMBER E-06/20-52229 28E-2020-00875C
MISSOURI COMMISSION ON HUMAN RIGHTS and EEOC FILED State or local Agency, if any			
NAME (Indicate Mr., Ms., Mrs.) Meghan Hodge		HOME TELEPHONE (Include Area Code) (314) 309-8138	
STREET ADDRESS 1420 Mississippi Ave.		CITY, STATE AND ZIP CODE St. Louis, MO 63104	DATE OF BIRTH 03/04/1974
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME Meredith Corp. and KMOV-TV	NUMBER OF EMPLOYEES, MEMBERS 500+	TELEPHONE (Include Area Code) (314) 621-4444	
STREET ADDRESS One Memorial Drive	CITY, STATE AND ZIP CODE St. Louis, MO 63102	COUNTY St. Louis City	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es)) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> AGE <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER		DATE DISCRIMINATION TOOK PLACE EARLIEST (ADEA/EPA) LATEST (ALL) Sept. 17, 2020	
		<input type="checkbox"/> CONTINUING ACTION	

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I was employed by KMOV-TV as a meteorologist from April 2014 to September 17, 2020 when I was terminated by KMOV. I am a female and I was 46 years old at the time of my termination. When KMOV hired me, I was hired into the No. 2 meteorologist position and my broadcast times were Monday through Friday at 12noon and 5pm. The No. 1 position was held by Steve Templeton, a male, and his broadcast times were Monday through Friday at 6pm and 10pm.

In February 2018, KMOV's News Director Scott Diener planned to remove me from my No. 2 broadcast assignments and replace me with Templeton and the other male meteorologist Kent Ehrhardt. I complained my SAG-AFTRA union representative that Diener was demoting me because of my gender, female, and age. At that time meteorologist Kristen Cornett and I were the only women over 40 on the air at KMOV. Diener's action would diminish the roles of the female meteorologists and expand the roles and on-air time of the male meteorologists. As a result of my complaint, Diener did not alter the assignments. But Diener threatened to make these changes when my contract came up for renewal in 2020. After that, Diener retaliated against me by interrupting or distracting me during my broadcasts. Later in 2018, Diener created unwritten severe weather broadcast policies that excluded me from participating in the broadcast of major weather events. I complained to KMOV's HR representatives and SAG-AFTRA in 2018 and 2019 about Diener's conduct and claimed Diener created a hostile work environment. Then, in January 2020 Diener demoted me by changing my schedule from 10 weekday broadcasts as the No. 2 meteorologist to 4 of the least important shows during the weekend broadcasts. In addition to the weekend time slots, Diener assigned me to reporting duties Wednesday, Thursday and Fridays even though I did not have a journalism degree or experience.

I complained to SAG-AFTRA and stated KMOV demoted me because of age, gender and previous complaints about discrimination. On January 23, 2020, SAG-AFTRA filed a grievance on my behalf against Meredith Corp and KMOV-TV for discrimination. Diener and KMOV received notice of my grievance the next day. On that same day, Diener removed me from my weather reporting duties and assigned me to report on a bus crash.

On April 28, 2020 my grievance was elevated to arbitration, and Diener and KMOV received notice of the arbitration that same day. On April 30, 2020 Diener again retaliated against me by assigning me to general news

EXHIBIT

1

reporting duties 1 day per week.

On May 4, 2020 KMOV furloughed all news staff, and we moved to a 4-day work week instead of 5-day. Diener still assigned me to 1 day of general reporting duties during the 4-day work week. So I could only work as a meteorologist on 3 of those 4 days. I was the only one out of 4 full-time meteorologists assigned to a general news reporter shift, and I was the only meteorologist who continued to grieve her discrimination complaints and pursue arbitration. And I was the only Certified Broadcast Meteorologist of the 41 meteorologists in the nine Meredith Corp stations in the top 50 U.S. television markets who was assigned to general reporting duties.

KMOV continued to assign me to general news reporting even when there were serious weather events that coincided with my general reporting duties.

On June 22, 2020 I filed a charge of discrimination with the EEOC and MCHR based on age, sex and retaliation against KMOV/Meredith.

On July 1, 2020, a new general manager JD Sosnoff was assigned to KMOV. I sent an email to Sosnoff notifying him of my complaints about Diener, the hostile work environment created by Diener's harassment and the retaliatory conduct directed to me. The GM replied that he was aware of my charge and upcoming arbitration in December. Sosnoff did nothing in response to my complaints about the hostile work environment created by Diener.

On September 5, 2020, KMOV lifted the furlough. I returned to work on the same weekend schedule/general reporting assignments. On September 17th, Sosnoff and HR rep Darion Watson fired me and they told me that KMOV eliminated my position.

I believe KMOV-TV harassed me and treated me differently in the terms and conditions of my employment because of my sex and age, and in retaliation for complaining about sex and age discrimination. The discrimination and retaliatory conduct of KMOV-TV created a hostile work environment for me.

I believe I was terminated because of my age, sex and in retaliation for my complaints of discrimination.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

NOTARY

KATHERINE TEETER
Notary Public, Notary Seal
State of Missouri
Montgomery County
Commission # 17341750
My Commission Expires February 28, 2021

I swear or affirm that I am the person who has made the foregoing statement and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Meghan M. Hodge
SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, month, and year)

21, October, 2020 *Katherine Teeter*

10/21/20 *Meghan M. Hodge*
Date Charging Party (Signature)

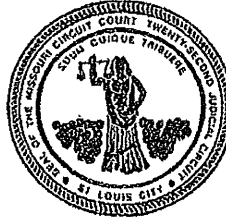
EEOC FORM 5 (10/94)

FILED

OCT 22 2020

MO Commission on Human Rights
Jefferson City Office

In the
CIRCUIT COURT
 City of St. Louis, Missouri



For File Stamp Only

Meghan Hodge

Plaintiff/Petitioner

January 19, 2021

Date

vs.

2122-CC00122

Case number

Meredith Corp. of Iowa, and Scott Diener

Defendant/Respondent

1

Division

REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now Plaintiff Meghan Hodge, pursuant
 Requesting Party

to Local Rule 14, requests the appointment by the Circuit Clerk of

Robyn Hendricks

P.O.Box 31321, St. Louis MO 63131

314-966-2850

Name of Process Server

Address

Telephone

John Hefe

P.O.Box 31321, St. Louis MO 63131

314-966-2850

Name of Process Server

Address

Telephone

Name of Process Server

Address

Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE:

Meredith Corp. of Iowa d/b/a KMOV

Name

The Corporation Co., 120 S. Central Ave.

Address

St. Louis, MO 63105

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Appointed as requested:

TOM KLOEPPINGER, Circuit Clerk

By

Deputy Clerk

Date

SERVE:

Scott Diener

Name

KMOV-TV, One Memorial Dr.

Address

St. Louis, MO 63102

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Jill A Silverstein

Attorney/Plaintiff/Petitioner
34433

Bar No.

530 Maryville Cntr Dr. Ste 460, St. Louis 63141

Address

314-744-4010

Phone No.

In the
CIRCUIT COURT
 City of St. Louis, Missouri



For File Stamp Only

Meghan Hodge

Plaintiff/Petitioner

January 19, 2021

Date

vs.

2122-CC00122

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 to Local Rule 14, requests the appointment by the Circuit Clerk of

Robyn Hendricks P.O.Box 31321, St. Louis MO 63131 314-966-2850
 Name of Process Server Address Telephone

John Hefe P.O.Box 31321, St. Louis MO 63131 314-966-2850
 Name of Process Server Address Telephone

Name of Process Server Address Telephone

Name of Process Server Address Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE:

Meredith Corp. of Iowa d/b/a KMOV

Name
 The Corporation Co., 120 S. Central Ave.

Address
 St. Louis, MO 63105

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Appointed as requested:

TOM KLOEPPINGER, Circuit Clerk

By M MCMULLEN

Deputy Clerk

JANUARY 19, 2021

Date

SERVE:

Scott Diener

Name
 KMOV-TV, One Memorial Dr.

Address
 St. Louis, MO 63102

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Jill A Silverstein

Attorney/Plaintiff/Petitioner
 34433

Bar No.
 530 Maryville Cntr Dr. Ste 460, St. Louis 63141

Address
 314-744-4010


Phone No.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00122	
Plaintiff/Petitioner: MEGHAN HODGE	Plaintiff's/Petitioner's Attorney/Address JILL A SILVERSTEIN 530 MARYVILLE CENTER DRIVE SUITE 460 ST LOUIS, MO 63141	R HENDRICKS SPECIAL PROCESS SERVER J HEFELE SPECIAL PROCESS SERVER
Defendant/Respondent: MEREDITH CORPORATION OF IOWA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Employmnt Discrmtn 213.111		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: MEREDITH CORPORATION OF IOWA	
Alias:	
THE CORPORATION COMPANY 120 S. CENTRAL AVE. ST LOUIS, MO 63105	SPECIAL PROCESS SERVER
 CITY OF ST LOUIS	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>January 19, 2021</p> <p>_____ Date</p> <p>_____ Clerk</p>

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$_____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00122	
Plaintiff/Petitioner: MEGHAN HODGE	Plaintiff's/Petitioner's Attorney/Address JILL A SILVERSTEIN 530 MARYVILLE CENTER DRIVE SUITE 460 ST LOUIS, MO 63141	R HENDRICKS SPECIAL PROCESS SERVER J HEFELE SPECIAL PROCESS SERVER
vs.		
Defendant/Respondent: MEREDITH CORPORATION OF IOWA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Employmnt Discrmnth 213.111		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: SCOTT DIENER
Alias:

KMOV-TV
ONE S. MEMORIAL DR.
SAINT LOUIS, MO 63102

SPECIAL PROCESS SERVER

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

January 19, 2021

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

☐ other: _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary \$ _____
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$. _____ per mile)
 Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00122	
Plaintiff/Petitioner: MEGHAN HODGE	Plaintiff's/Petitioner's Attorney/Address JILL A SILVERSTEIN 530 MARYVILLE CENTER DRIVE SUITE 460 ST LOUIS, MO 63141	R HENDRICKS SPECIAL PROCESS SERVER J HEFÉLE SPECIAL PROCESS SERVER
vs.		
Defendant/Respondent: MEREDITH CORPORATION OF IOWA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Employmnt Discrmntn 213.111		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: SCOTT DIENER
Alias:

KMOV-TV
ONE S. MEMORIAL DR.
SAINT LOUIS, MO 63102

SPECIAL PROCESS SERVER

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

January 19, 2021

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____

Served at _____ (address)

In _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

St. Louis Investigations & Process Service
P.O. Box 31321
St. Louis, Mo. 63131
314-966-2850
Fax: 314-822-1834

AFFIDAVIT OF SPECIAL PROCESS SERVER

I, John J. Hefelee, being duly sworn, upon my oath, state that I have served a true copy of the attached:

Case #: 2122-CC00122

 Subpoena
✓ Summons with Petition
✓ 1st Interrogatories, 1st Request for Production,
disc. of discovery

By delivering on the 5 February, 2021 To:

Scott Deiner
at One S. Memorial Dr, St. Louis, Mo. 63102 at 58 AM/PM.

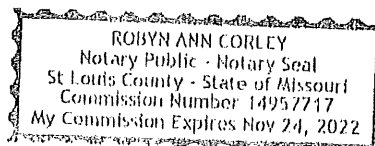
Check amount:

All done in St. Louis City/County, Missouri/Illinois

John J. Hefelee
John J. Hefelee

Subscribed and sworn before me this 5 February, 2021

Robyn Ann Corley
Robyn A. Corley
Notary






IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00122	
Plaintiff/Petitioner: MEGHAN HODGE	Plaintiffs/Petitioner's Attorney/Address JILL A SILVERSTEIN 530 MARYVILLE CENTER DRIVE SUITE 460 ST LOUIS, MO 63141	R HENDRICKS SPECIAL PROCESS SERVER J HEFELE SPECIAL PROCESS SERVER
vs.		
Defendant/Respondent: MEREDITH CORPORATION OF IOWA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Employment Discrimination 213.111		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: MEREDITH CORPORATION OF IOWA Alias:	
THE CORPORATION COMPANY 120 S. CENTRAL AVE. ST LOUIS, MO 63105	SPECIAL PROCESS SERVER
 CITY OF ST LOUIS	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>January 19, 2021</p> <p>Date</p> <p>Further Information:</p>
	<p><i>Thomas Hoepfinger</i></p> <p>Clerk</p>

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server _____ Signature of Sheriff or Server _____

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal) My commission expires: _____ Date _____ Notary Public _____

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

St. Louis Investigations & Process Service
P.O. Box 31321
St. Louis, Mo. 63131
314-966-2850
Fax: 314-822-1834

AFFIDAVIT OF SPECIAL PROCESS SERVER

I, John J. Hefe, being duly sworn, upon my oath, state that I have served a true copy of the attached:

Case #: 2122-CC00122

 Subpoena
 ☒ Summons with Petition
 ☒ 1st Interrogatories; 1st Request for Production; Disc
 of Discovery

By delivering on the 1 February, 2021 to: Meredith Corporation of Iowa
d/o CT Corporation, Registered Agent & Bonnie Love
at 120 S. Central Ave, St. Louis, Mo. 63105 at 12:05 AM/PM

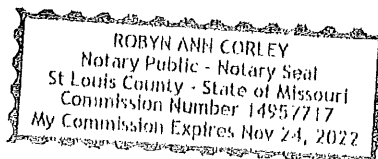
Check amount:

All done in St. Louis City/County, Missouri/Illinois

John J. Hefe
John J. Hefe

Subscribed and sworn before me this 1 February, 2021

Robyn Ann Corley
Robyn A. Corley
Notary





MICHAEL L. PARSON
GOVERNOR

ANNA S. HUI
DEPARTMENT DIRECTOR

MARTHA STAGGS
COMMISSION CHAIR

ALISA WARREN, PH.D.
EXECUTIVE DIRECTOR

Meghan Hodge
1420 Mississippi Avenue
Saint Louis, MO 63104
Via Email

RE: Meghan Hodge vs. MEREDITH CORPORATION D/B/A KMOV-TV
E-06/20-52229 28E-2020-00875C

The Missouri Commission on Human Rights (MCHR) is terminating its proceedings and issuing this notice of your right to sue under the Missouri Human Rights Act because you have requested a notice of your right to sue.

This letter indicates your right to bring a civil action within 90 days of the date of this notice against the respondent(s) named in the complaint. Such an action may be brought in any circuit court in any county in which the unlawful discriminatory practice is alleged to have occurred, but it must be brought no later than two years after the alleged cause occurred or its reasonable discovery. Upon issuance of this notice, the MCHR is terminating all proceedings relating to the complaint. No person may file or reinstate a complaint with the MCHR after the issuance of a notice of right to sue relating to the same practice or act. You are hereby notified of your right to sue the Respondent(s) named in your complaint in state circuit court. **THIS MUST BE DONE WITHIN 90 DAYS OF THE DATE OF THIS NOTICE OR YOUR RIGHT TO SUE IS LOST.**

You are also notified that the Executive Director is hereby administratively closing this case and terminating all MCHR proceedings relating to it. This notice of right to sue has no effect on the suit-filing period of any federal claims. This notice of right to sue is being issued as required by Section 213.111.1, RSMo, because it has been over 180 days after the filing of the complaint and MCHR has not completed its administrative processing.

Respectfully,

Alisa Warren, Ph.D.
Executive Director

January 15, 2021
Date

C: additional contacts listed on next page



JEFFERSON CITY OFFICE
421 E. DUNKLIN STREET
P.O. BOX 1129
JEFFERSON CITY, MO 65102-1129
PHONE: 573-751-3325
FAX: 573-751-2905

ST. LOUIS OFFICE
111 N. 7TH STREET, SUITE 903
ST. LOUIS, MO 63101-2100
PHONE: 314-340-7590
FAX: 314-340-7238

KANSAS CITY OFFICE
P.O. BOX 1129
JEFFERSON CITY, 65102-1129
FAX: 816-889-3582

SIKESTON OFFICE
106 ARTHUR STREET, SUITE D
SIKESTON, MO 63801-5454
FAX: 573-472-5321

Missouri Commission on Human Rights is an equal opportunity employer/program. Auxiliary aides and services are available upon request to individuals with disabilities.

TDD/TTY: 1-800-735-2066 (TDD) Relay Missouri: 711
www.labor.mo.gov/mohumanrights E-Mail: mchr@labor.mo.gov



RE: Meghan Hodge vs. MEREDITH CORPORATION D/B/A KMOV-TV
E-06/20-52229 28E-2020-00875C

MEREDITH CORPORATION D/B/A KMOV-TV
One Memorial Drive
Saint Louis, MO 63102
Via Respondent Contact Email

David J. Masud and Brian P. Swanson
MASUD LABOR LAW GROUP
4449 Fashion Square Boulevard, Suite 1
Saginaw, MI 48603
Via Email

Jill A. Silverstein
SILVERSTEIN WOLF, LLC
530 Maryville Centre Drive, Suite 460
Saint Louis, MO 63141
Via Email